

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

AXLE OF DEARBORN, INC., d/b/a  
DETROIT AXLE, a Michigan corporation,  
DETROIT AXLE, INC., a Michigan  
corporation; and DETROIT AXLE QSSS,  
INC., a Michigan corporation,

Plaintiffs,

v.

DETROIT IT, LLC, a Michigan limited  
liability company, ERIC GRUNDLEHNER, an  
individual, ~~and STEPHANIE MILLER, an~~  
~~individual,~~

Defendants,

and

DETROIT IT, LLC, a Michigan limited  
liability company,

Counterclaim Plaintiff,

v.

AXLE OF DEARBORN, INC., d/b/a  
DETROIT AXLE, a Michigan corporation,  
DETROIT AXLE, INC., a Michigan  
corporation, and DETROIT AXLE QSSS,  
INC., a Michigan corporation, and  
MOUHAMED MUSHEINESH,  
an individual, jointly and severally,

Counterclaim Defendants.

Case No. 21-cv-10163  
Hon. Gershwin A. Drain  
Magistrate Anthony P. Patti

**MARK ROSSMAN, LINDA  
OSZUST, AND ISRA KHUJA'S  
MOTION TO WITHDRAW AS  
COUNSEL FOR  
DEFENDANTS, AND BRIEF IN  
SUPPORT**

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**MARK ROSSMAN, LINDA OSZUST, AND ISRA KHUJA’S MOTION TO  
WITHDRAW AS COUNSEL FOR DEFENDANTS, AND BRIEF IN SUPPORT**

NOW COMES, Defendants’ counsel, Mark Rossman, Linda Oszust, and Isra Khuja, and hereby respectfully move this Honorable Court to authorize their withdrawal as counsel for all Defendants, Detroit IT, LLC, and Eric Grundlehner (“Defendants”) in this matter, and in further support thereof, state as follows:

The Local Rules provide that, after filing an appearance, an attorney may withdraw only on order of the Court. See E.D. Mich. LR 83.25(b)(2).

There has been an irreconcilable breakdown of the attorney-client relationship with Defendants, such that the Undersigned and the firm of Rossman, P.C. cannot continue to zealously represent Defendants in this matter.

The breakdown of the attorney-client relationship has progressed to such a degree that further representation has become unreasonably difficult. MRPC 1.16(b)(5). Moreover, pursuant to MRPC 1.16(b)(4) and MRPC 1.16(b)(6), a lawyer may withdraw from representation if the withdrawal can be accomplished without material adverse effect on the interests of the client, or if the client fails to fulfill an obligation to the lawyer, or if other good cause exists. The breakdown of the attorney-client relationship has undermined counsel’s ability to represent the Defendants and further representation is impossible, necessitating withdrawal.

The Court recently entered an Order Extending Dates in the Scheduling Order. (ECF No. 90). The next pending date is for the filing of an expert witness list

(December 28, 2023), which has already been filed. The next pending date after that is the discovery cutoff of February 29, 2024. Trial is set for May 15, 2024.

Based on the foregoing, Defendants are not prejudiced by the withdrawal of Mark Rossman, Linda Oszust, and Isra Khuja as counsel in this matter, because there is ample time for the Defendants to secure new counsel if they so choose. Pursuant to LR 7.1, the Undersigned asked for Defendants' concurrence in this motion, however, concurrence was denied. The Undersigned asked for Plaintiffs' concurrence, and it was not granted.

WHEREFORE, Mark Rossman, Linda Oszust, Isra Khuja, and the firm of Rossman, P.C. respectfully request that this Court grant their Motion to Withdraw as Counsel and grant any other relief that the Court deems just and equitable under the circumstances.

Respectfully submitted,

**ROSSMAN, P.C.**

Dated: November 30, 2023

By: /s/ Linda R. Oszust  
Mark C. Rossman (P63034)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2023, I electronically filed the foregoing document using the Court's electronic filing system, serving same upon all counsel of record authorized to receive such filings.

/s/ Linda R. Oszust

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